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JAN 10 1994

FCC - MAIL ROOM

Before the  
FEDERAL COMMUNICATION COMMISSION  
Washington, DC 20554

In the matter of:

NPRM PR Docket 93-267 Granting Temporary Operating Authority to  
New Amateur Radio Operators

I am not in favor of the current Federal Communication  
Commission proposal in it's present form.

For "Instant Licensing" to be implemented it must pass  
a series of checks, which must include being tamper  
resistant to insure a very high level of integrity,  
easy for Volunteer Examiner Coordinators and their examining  
teams to administer, a means of cross checking, cost effective  
maintainance and record keeping (compatible with present  
processing systems), no duplication of effort or call  
signs, give the successful applicant "Instant Licensing", and  
keep the Federal Communication Commission in complete and  
effective control over the whole process.

Knowing that the "Instant Licensing" concept is important  
to several parties, and can be implemeted in such a way as to be  
a benefit for the Amateur Radio Service, I'd like to propose the  
following method of "Granting Temporary Operating Authority to  
New Amateur Radio Operators".

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Granting Temporary Operating Authority to New Amateur Radio Operators

I propose that the FCC end the waiting period for those who were unlicensed (no call sign) prior to their successfully passing a Volunteer Examiner administered Amateur Radio Examination.

In issuing call signs to the applicant, who has earned a Certificate of Successful Completion of Examination (CSCE) by passing the examination elements required for the license, the FCC could use the successful state of the art sealed envelope technology, presently in use by other governmental agencies and in the private sector. The FCC would distribute these to the current Volunteer Examination Coordinators, for use by their Volunteer Examiner teams.

With this sealed envelope technology, the FCC would issue random blocks of 2 X 3 Group D call signs to the VECs. The Group D call signs would be used as no one can predict the applicants future upgrade desires or activity.

Each call sign would be unique. The process of duplication by issuing a WX ##### callsign, then a regular Amateur call sign would be eliminated, saving time, another waiting period, and expense.

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By using the call signs from Group D, the problem of conforming to ITU regulations, the problem-plagued concept of "self assigned" call signs, with no means for local amateurs to check the validity of a suspicious operator would not exist.

The new amateur would receive his or her call sign immediately after being notified by the VE team of his or her successfully passing the examination. It would be subject to the same proposed 120 day temporary operating authority which could be modified or cancelled, by the FCC, at any time. Those with a history of non compliance with FCC Amateur Radio Service rules would be ineligible. The new licensee would retain the option to change the call sign if and when he or she desired.

This would insure a much higher level of integrity, control, and less chance of errors creeping into the system, than that of NPRM PR Docket 93-267.

Before, the sealed envelope is sent to the VEC, the FCC would type the call sign onto the envelope. Due to the envelope's construction (four multi colored layers), the call sign would only appear on the sheets inside. Provision could be made on the outside (plus it would show up on the copies inside) for all three correcting VEs to sign the document, adding such things as date, VEC, exam site, elements passed, and license qualified for, etc.

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The 2X3 call sign would be revealed only when opened by the applicant in front of the VE team. The new amateur, the VEC, and VE team would retain a copy of the temporary operating authority, with the FCC receiving its copy via the VEC. The new Amateur would receive his or her permanent license within the present 120 day period, subject to FCC approval. Use of such sealed envelope technology would conform to present FCC, ITU, and VEC rules and regulations, and processing methods, with the added bonus of giving the new amateur an "Instant License".

In summary....

My proposal has as its central tenants, integrity of the system, lack of duplication and additional expense, and utilization of present resources and people to enhance what is in place and working.